

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:	*	
	*	
CHARLES MARTIN	*	Case 20-18680-MCR
	*	Chapter 7
Debtor	*	

* * * * *

TRUSTEE'S OPPOSITION TO DEBTOR'S MOTION FOR APPROPRIATE RELIEF

Cheryl E. Rose, the Chapter 7 Trustee of the above captioned bankruptcy estate, by and through her counsel, Cheryl E. Rose, Esq. and Rose & Associates, LLC, opposes the Debtor's Motion for Appropriate Relief (hereinafter "Opposition") and states as follows:

1. The Debtor filed a Voluntary Chapter 11 Petition on September 24, 2020 which was converted to a case under Chapter 7 on December 16, 2022.
2. The Debtor appears to be requesting this Court to convert his case back to Chapter 11. Despite the case being previously converted, the Debtor is requesting this relief under 11 USC §706(a). This is an erroneous reliance by the Debtor.
3. This case has been replete with the Debtor's promises and assertions, none of which have been realized. The Court is fully aware of the many issues that have arisen in this case. The most obvious deficiency by the Debtor is his bad faith in that he has not paid any of the monetary sanctions ordered by this Court in the total amount of \$45,000.00.
4. The Trustee has no confidence that the Debtor will cooperate with the Trustee if this case were reconverted to a Chapter 11, nor does she believe that the Debtor has any

particular expertise to contribute to the liquidation of this case. Further, the Trustee does not believe that the Debtor can provide any assistance in this case when his actions to date have only seriously complicated this case. He has never provided any “assistance”; he has only provided roadblocks to the administration of this case.

WHEREFORE, the Trustee requests that the Court (1) deny the Debtor’s Motion for Appropriate Relief; and (2) grant such other and further relief as it deems just.

Respectfully submitted,

ROSE & ASSOCIATES, LLC

/s/ Cheryl E. Rose
Cheryl E. Rose, Chapter 7 Trustee, #05934
9812 Falls Road, #114-334
Potomac, MD 20854
(301) 527-7789

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of December, 2024, copy of the foregoing Trustee's Opposition to Debtor’s Motion for Appropriate Relief will be served electronically by the Court’s CM/ECF system on the following:

- **Glenna Elizabeth Barner** Glenna.Barner@maryland.gov
- **Marie Louise Hagen** mlh@mlhagenlaw.com
- **Keith R. Havens** Keith.R.Havens@HavensLawFirm.com,
Madeline.Reed@HavensLawFirm.com
- **James M. Hoffman** jhoffman@offitkurman.com, mmargulies@offitkurman.com
- **Nikita Rajendra Joshi** Nikita.Joshi@bww-law.com, bankruptcy@bww-law.com
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- **Lynn A. Kohen** lynn.a.kohen@usdoj.gov
- **Darren Michael Margolis** dmargolis@lawdmpa.com
- **Shannon Jacob Posner** sjposner@posner-law.com
- **L. Jeanette Rice** Jeanette.Rice@usdoj.gov, USTPRegion04.GB.ECF@USDOJ.GOV
- **Cheryl E. Rose** trusteeose@aol.com, crose@ecf.axosfs.com
- **Roger Charles Simmons** rsimmons@gordonsimmons.com, dwise@gordonsimmons.com;

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- **Lisa Yonka Stevens** lisa.y.stevens@usdoj.gov
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- **Brett Weiss** brett@bankruptcylawmaryland.com, brettecf@gmail.com; TheWeissLawGroup@jubileebk.net; deb@BankruptcyLawMaryland.com

I HEREBY FURTHER CERTIFY that on this 27th day of December, 2024, a copy of the foregoing Trustee's Opposition to Debtor's Motion for Appropriate Relief was mailed first class mail, postage prepaid to the following:

James H. Brandon
16905 Germantown Road
Germantown, MD 20874

Charles Martin
5803 Lowery Lane
Upper Marlboro, MD 20772

United States Marshals Service
Attention: Mathew Silverman, Chief
6500 Cherrywood Lane
Greenbelt, MD 20770

Andrew A. Werner
REMAX Realty Group
6 Montgomery Village Ave., Suite 200
Gaithersburg, MD 20879

/s/ Cheryl E. Rose
Cheryl E. Rose, #05934